

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TONI TAYLOR, CARY BALL SR., AND )  
CATLIN S. WILLIAMS, AS NEXT )  
FRIEND OF C. S. W. )

Plaintiffs, )

v. )

BOARD OF POLICE COMMISSONERS, )  
AND ST. LOUIS METROPOLITAN )  
POLICE OFFICERS )

Defendants. )

Cause No.

**JURY TRIAL DEMANDED**

**AMENDED NOTICE OF REMOVAL TO FEDERAL COURT**

Defendant Board of Police Commissioners, hereby notifies this Court of the removal of the case styled *Toni Taylor, et al. v. Board of Police Commissioners, et al.*, Case No. 1322-CC08692, from the Circuit Court of the City of St. Louis, State of Missouri, to this Court. As grounds for this removal, Defendant states:

1. On June 25, 2013, plaintiff filed a petition against the Defendant in the Circuit Court of the City of St. Louis, State of Missouri, in *Toni Taylor, et al. v. Board of Police Commissioners, et al.*, Case No. 1322-CC08692.

2. Count V in the petition is brought under 42 U.S.C. § 1983, and 42 U.S.C. § 1988 for alleged violations of the plaintiff's fourth and fourteenth amendment rights.

3. Plaintiffs effected service on defendant, Board of Police Commissioners on July 9, 2013. Defendant has removed this case within thirty days thereafter. Such removal is timely under 28 U.S.C. 1446(b) and *Murphy Brothers, Inc. v. Michetti Pipe Stringing, Inc.*, 526 U.S. 344, 354-355 (1999).

5. Pursuant to Local Rule 2.03 a copy of all process, pleadings, orders and other documents on file in the State court were previously filed with the court.

6. Venue is proper in this District under 28 U.S.C. 1441(a), because this District and Division embrace the place in which the removed action has been pending.

7. This Court has original jurisdiction over plaintiffs' civil rights lawsuit under 28 U.S.C. 1331.

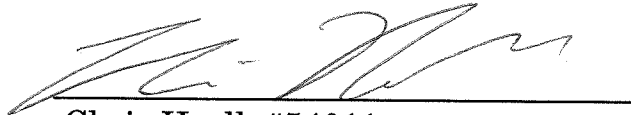
8. No other defendant has been served in this case.

9. Defendant has filed its filing fee in the amount of \$400.00 and the proof of filing the notice of removal with the Clerk of the State court.

WHEREFORE, Defendant petitions this Court for removal of *Toni Taylor, et al. v. Board of Police Commissioners, et al.*, Case No. 1322-CC08692, from the Circuit Court of the City of St. Louis, State of Missouri, to this Court.

Respectfully submitted,

**CHRIS KOSTER**  
Attorney General

A handwritten signature in dark ink, appearing to read "Chris Hoell", is written over a horizontal line.

Chris Hoell, #54011  
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*Attorneys for Board of Police  
Commissioners*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was mailed via first-class mail, postage prepaid, this 6<sup>th</sup> day of August, 2013, to:

BOSLEY and ASSOCIATES, LLC.

Freeman R. Bosley Jr.

Daniel Brown

611 N. 10<sup>th</sup> Street, Ste. 300

St. Louis, MO 63101

*Attorney for Plaintiffs*

  
Assistant Attorney General